

Samuel Lasser (SBN - 252754)  
meisen@edelson.com  
**LAW OFFICE OF SAMUEL  
LASSER**  
1934 Divisadero Street  
San Francisco, CA 94115  
Tel: 415.994.9930  
Fax: 415.776.8047

LUANNE SACKS (SBN 120811)  
lsacks@srclaw.com  
MICHELE D. FLOYD (SBN 163031)  
mfloyd@srclaw.com  
**SACKS, RICKETTS & CASE LLP**  
177 Post Street, Suite 650  
San Francisco, CA 94108  
Telephone: 415-549-0580  
Facsimile: 415-549-0640

Jay Edelson\*  
jedelson@edelson.com  
Rafey S. Balabanian\*  
rbalabanian@edelson.com  
Benjamin S. Thomassen\*  
bthomassen@edelson.com  
Amir Missaghi\*  
amissaghi@edelson.com  
**EDELSON PC**  
350 North LaSalle Street, Suite 1300  
Chicago, Illinois 60654  
Tel: 312.589.6370  
Fax: 312.589.6378

*Attorneys for Defendant*  
**SONY COMPUTER ENTERTAINMENT  
AMERICA, LLC**

\*Admitted *Pro hac vice*

*Attorneys for Plaintiff Douglas Ladore  
and the Putative Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

DOUGLAS LADORE, individually and on  
behalf of all others similarly situated,

*Plaintiff,*

v.

SONY COMPUTER ENTERTAINMENT  
AMERICA, LLC, a Delaware limited  
liability company,

*Defendant.*

No. 3:14-CV-03530-EMC

**STIPULATION AND ~~PROPOSED~~  
ORDER MODIFYING HEARING  
DATE AND BRIEFING SCHEDULE  
ON DEFENDANT'S MOTION TO  
DISMISS**

Hon. Edward M. Chen

[Local Rule 6-2]

Pursuant to paragraph 4 of the Civil Standing Order for United States District Court Judge Edward M. Chen and Northern District Local Rule 6-2, the Parties hereto, through their respective counsel of record, stipulate as follows:

WHEREAS, Plaintiff Douglas Ladore ("Plaintiff") filed his Class Action Complaint on August 5, 2014 (Dkt. 1);

WHEREAS, Defendant Sony Computer Entertainment America, LLC ("Defendant") filed a Motion to Dismiss the Complaint, supporting Memorandum, and Request for Judicial Notice on October 29, 2014 (Dkts. 30, 31);

WHEREAS, on November 3, 2014, the parties conferred and Plaintiff indicated that, due to the availability of counsel, he requires additional time to prepare and file his responses to Defendant's Motion to Dismiss and Request for Judicial Notice. The parties also agreed that scheduling issues pertaining to the upcoming Thanksgiving holiday necessitate further adjustments to the briefing and hearing schedule on Defendant's Motion to Dismiss and Request for Judicial Notice;

WHEREAS, Plaintiff's Opposition to Defendant's Motion to Dismiss and Request for Judicial Notice are presently due on November 12, 2014 and Defendant's reply in support of its Motion to Dismiss and Request for Judicial Notice is presently due on November 19, 2014 with a hearing scheduled on December 11, 2014 at 1:30 pm before Judge Edward M. Chen in Courtroom 5 on the 17th Floor of the United States Courthouse located at 450 Golden Gate Avenue, San Francisco, CA 94102;

WHEREAS, the parties stipulate and agree to move the hearing date to accommodate modifications to the briefing schedule as follows:

#### **STIPULATION**

1. The parties, by and through their undersigned counsel, respectfully request that the hearing on Defendant's Motion to Dismiss be moved to December 18, 2014;

2. Plaintiff's time in which to file his Opposition to Defendant's Motion to Dismiss and Request for Judicial Notice be extended to November 26, 2014 to give Plaintiff sufficient time

1 to fully consider and brief the issues raised by Defendant's Motion to Dismiss and Request for  
2 Judicial Notice.

3 3. Defendant's time in which to file its reply be extended to December 10, 2014 to  
4 accommodate scheduling conflicts and the Thanksgiving holiday.

5 4. The dates requested in this stipulation will not interfere with any dates previously  
6 set by order of the Court.

7 5. All parties agree to the stipulation as indicated by their signatures below. The  
8 parties respectfully request that the Court approve the stipulation, pursuant to Civil L.R. 6-2 and  
9 enter an Order thereupon. A Proposed Order is filed herewith.

10  
11 Respectfully submitted,

12 EDELSON PC

13 Dated: November 7, 2014

By: /s/ Benjamin S. Thomassen

14 Benjamin S. Thomassen  
15 Attorney for Plaintiff

16 SACKS, RICKETTS & CASE, LLP

17 Dated: November 7, 2014

By: /s/ Michele Floyd

18 Michele Floyd  
19 Attorney for Defendant

20 **ATTESTATION**

21 Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the  
22 filing of this document has been obtained from the other signatories.

23 Dated: November 7, 2014

/s/ Benjamin S. Thomassen  
24 Benjamin S. Thomassen

**[PROPOSED ORDER]**

The Court, having considered the above joint request and good cause appearing therefore,  
HEREBY ORDERS that:

The hearing of this matter will be held on December 18, 2014 at 1:30 p.m. Breifing shall  
proceed as follows:

Opposition: November 26, 2014;

Reply: December <sup>8</sup>~~10~~, 2014.

IT IS SO ORDERED. Case Management Conference is reset from Nov.  
20, 2014 to December 18, 2014 at 1:30 p.m. Joint  
CMC Statement due December 11, 2014.  
Dated: 11/10/14

HONORABLE EDWARD M. CHEN  
UNITED STATES DISTRICT JUDGE

